

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

NICOLAS VALADEZ REY and  
JESSICA LEANNE QUINN,

Plaintiffs,

Civil Action No. 4:19-CV-00714-LMC

v.

GENERAL MOTORS LLC,

Defendants.

**JOINT MOTION TO EXTEND SCHEDULING ORDER DATES**

Pursuant to the Court’s Scheduling and Trial Order (Doc. 20), subsequently amended (Doc. 26), the parties respectfully request that the Court extend the pre-trial deadlines set-out herein by 30 days (the “Motion”).

In support of the Motion, and consistent with the Court’s directives on motions for extensions of time, the parties submit that there is good cause for the extension. Through no fault of the parties, compliance with the discovery deadline is not possible in light of the Coronavirus Disease 2019 (“COVID-19”) outbreak, which was declared a global pandemic by the World Health Organization. In an effort to decrease the spread of the disease, travel has been restricted by governments and businesses, and social-distancing has been ordered. As such, the parties have not been able to complete the necessary fact discovery required for expert witness analysis and opinions. Various other expert activities have also been delayed as a result of the outbreak and related travel restrictions/social-distancing measures, including in-person vehicle inspections.

A 60-day extension of non-trial related deadlines was previously granted by the Court (Doc. 26).

The current deadlines, and the parties' proposed extension, is set out below:

<b>Event</b>	<b>Current Date</b>	<b>Proposed Date</b>
Motions to join additional parties	June 1, 2020	July 1, 2020
Motions to amend pleadings	June 1, 2020	July 1, 2020
Plaintiffs' expert designations	June 2, 2020	July 2, 2020
Defendants' expert designations	July 4, 2020	August 4, 2020
Discovery motions	July 18, 2020	August 18, 2020
Discovery cutoff	August 1, 2020	September 1, 2020
Motions pertaining to collateral estoppel	August 8, 2020	September 8, 2020
Dispositive motions	September 1, 2020	October 1, 2020
Motions to strike experts	September 1, 2020	October 1, 2020
Choice of law motions	September 1, 2020	October 1, 2020

WHEREFORE, the parties respectfully request that the Court grant the Motion and extend the pre-trial deadlines set out herein.

May 6, 2020

RESPECTFULLY SUBMITTED:

/s/ Bradley L. Leger (w/ permission)  
Bradley L. Leger  
Kassi Dee Patrick Marks  
Leger Ketchum & Cohoon, PLLC

*Attorneys for Plaintiffs*

/s/ John D. Black  
Michael P. Cooney  
John D. Black  
Dykema Gossett PLLC

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing on May 6, 2020 via the Court's electronic filing system, which will generate a notice to all counsel of record.

/s/ John D. Black \_\_\_\_\_  
Attorney